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| CLERK US DISTRICT COURT DISTRICT OF NEVADA | |
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

FOREMOST SIGNATURE INSURANCE
COMPANY, a Michigan corporation duly
licensed to sell and administer insurance in
The State of Nevada,

Plaintiff,

Vs.

GMUENDER ENGINEERING, LLC, a Nevada
limited liability company; JOSEF C.
GMUENDER and JANE DOE GMUENDER,
husband and wife; MARY E. GMUENDER and
JOHN DOE GMUENDER, husband and wife;
WILLIAM HUBER, parent and guardian of
Ashley Huber and Taylor Huber, individually and
as surviving children of Kelly Huber, deceased;
GRANBY REALTY HOLDINGS, LLC, a
Colorado limited liability company; GRANITE
STATE INSURANCE COMPANY, an Illinois
corporation; NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH
PA, a Pennsylvania corporation.

Defendants.

Case No. 3:19-cv-00508-MMD-~~CBC~~

CLB
ORDER

**STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO
DEFENDANTS GRANITE STATE
INSURANCE COMPANY AND NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH PA'S COUNTERCLAIMS
AGAINST FOREMOST SIGNATURE
INSURANCE COMPANY**

Plaintiff/Counter-Claim Defendant Foremost Signature Insurance Company ("Foremost") and
Defendants/Counter-Claim Plaintiffs Granite State Insurance Company ("Granite State") and National
Union Fire Insurance Company of Pittsburgh, PA ("National Union") (Granite State and National
Union together, "Defendants"), by and through their attorneys of record, hereby stipulate and agree to
extend the deadline for Foremost to file a responsive pleading to Defendants' Counterclaims up to and

1 including January 17, 2020.

2 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the requested
3 extension as this insurance coverage lawsuit arises from an underlying accident that took place in
4 December 2016 and involves underlying litigation in both Colorado State and Federal courts. The
5 Parties to this stipulation agree that additional time is needed to fully evaluate the coverage issues
6 presented in Defendants' counterclaims.

7 This is the parties' first request for an extension of the deadline.

8
9 RESPECTFULLY SUBMITTED this 10th day of January 2020.

10 CHRISTIAN, KRAVITZ, DICHTER, JOHNSON & SLUGA, LLC

11 By: /s/ Gena L. Sluga

12 Gena L. Sluga

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16 *Attorney for Plaintiff Foremost Signature Insurance
Company*

17 NICOLAIDES FINK THORPE MICHAELIDES SULLIVAN, LLP

18 By: /s/ Jeffrey N. Labovitch (w/ permission)

19 Jeffrey N. Labovitch

20 4365 Executive Drive, Suite 950

21 San Diego, CA 92121

22 *Attorney for Defendants Granite State Insurance Company
and National Union Fire Insurance Company of Pittsburgh,
PA*

23 **ORDER**

24 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

25 
26 _____
27 United States Magistrate Judge Carla Baldwin ~~Cary~~

28 DATED: 1/13/2020